

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**Caption in Compliance with D.N.J. LBR  
9004-1(b)**

**GENOVA BURNS LLC**

Daniel M. Stolz, Esq.  
Donald W. Clarke, Esq.  
Matthew I.W. Baker, Esq.  
dstolz@genovaburns.com  
dclarke@genovaburns.com  
mbaker@genovaburns.com  
110 Allen Road, Suite 304  
Basking Ridge, NJ 07920  
Tel: (973) 467-2700  
Fax: (973) 467-8126  
*Proposed Local Counsel for the Official  
Committee of Talc Claimants*

**MASSEY & GAIL LLP**

Jonathan S. Massey, Esq.  
Rachel S. Morse, Esq.  
jmassey@masseygail.com  
rmorse@masseygail.com  
1000 Maine Ave. SW, Suite 450  
Washington, DC 20024  
Tel: (202) 652-4511  
Fax: (312) 379-0467

*Proposed Special Counsel for the Official  
Committee of Talc Claimants*

**BROWN RUDNICK LLP**

David J. Molton, Esq.  
Robert J. Stark, Esq.  
Michael S. Winograd, Esq.  
Eric R. Goodman, Esq.  
dmolton@brownrudnick.com  
rstark@brownrudnick.com  
mwinograd@brownrudnick.com  
egoodman@brownrudnick.com  
Seven Times Square  
New York, NY 10036  
Tel: (212) 209-4800  
Fax: (212) 209-4801

and

Jeffrey L. Jonas, Esq.  
Sunni P. Beville, Esq.  
jjjonas@brownrudnick.com  
sbeville@brownrudnick.com  
One Financial Center  
Boston, MA 02111  
Tel: (617) 856-8200  
Fax: (617) 856-8201  
*Proposed Co-Counsel for the Official  
Committee of Talc Claimants*

**OTTERBOURG P.C.**

Melanie L. Cyganowski, Esq.  
Richard G. Haddad, Esq.  
Adam C. Silverstein, Esq.  
Jennifer S. Feeney, Esq.  
David A. Castleman, Esq.  
mcyganowski@otterbourg.com  
rhaddad@otterbourg.com  
asilverstein@otterbourg.com  
jfeeney@otterbourg.com  
dcastleman@otterbourg.com  
230 Park Avenue  
New York, NY 10169  
Tel: (212) 661-9100  
Fax: (212) 682-6104  
*Proposed Co-Counsel for the Official  
Committee of Talc Claimants*

In re:

**LTL MANAGEMENT LLC,<sup>1</sup>**

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Honorable Michael B. Kaplan

**NOTICE OF MOTION OF THE OFFICIAL COMMITTEE OF  
TALC CLAIMANTS TO TERMINATE THE DEBTOR'S  
EXCLUSIVE PERIOD PURSUANT TO 11 U.S.C. § 1121(d)(1)**

**THE TCC HAS ASSERTED AND CONTINUES TO ASSERT THAT THE DEBTOR'S CHAPTER 11 CASE WAS FILED IN BAD FAITH AND SHOULD BE DISMISSED. THIS MATTER IS PENDING BEFORE THIS COURT. ANY CHAPTER 11 PLAN THAT MAYBE PROPOSED BY THE TCC ASSUMES, *ARGUENDO*, THAT THE DEBTOR'S CHAPTER 11 CASE IS NOT DISMISSED AS A BAD FAITH FILING. THE TCC RESERVES ALL RIGHTS TO CONTINUE TO ARGUE THAT DISMISSAL IS REQUIRED UNDER THE BANKRUPTCY CODE.**

**PLEASE TAKE NOTICE** that the Official Committee of Talc Claimants (the “TCC” or the “Committee”) in the above-captioned case of LTL Management, LLC (the “Debtor” or “LTL”), by and through the TCC’s proposed counsel, will move before the Honorable Michael B. Kaplan, Chief United States Bankruptcy Judge for the United States Bankruptcy Court for the District of New Jersey, Trenton Vicinage, at the Clarkson S. Fisher U.S. Courthouse, located at 402 East State Street, Trenton, New Jersey 08608, in Courtroom No. 8, pursuant to 11 U.S.C. §§ 105(a) and 1121(d)(1) (the “**Motion**”) for entry of an order, substantially in the form submitted herewith, terminating the Debtor’s exclusivity period under 11 U.S.C. § 1121(b) to file a proposed plan under chapter 11 and to granting the TCC authority to file and seek confirmation of a chapter 11 plan.

---

<sup>1</sup> The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

**PLEASE TAKE FURTHER NOTICE** that, substantially contemporaneously with the filing of the Motion, the Committee also has filed an *Application for Order Shortening Time and Certain Other Relief* (the “**Scheduling Application**”) requesting that the hearing on the Motion be scheduled on June 13, 2023 at 10:00 a.m., consistent with remarks made by the Court during a hearing held on May 16, 2023.

**PLEASE TAKE FURTHER NOTICE** that, if the Scheduling Application is granted, objections, if any, must be presented in accordance with the Order entered by the Court with respect to the Scheduling Application. Otherwise, in accordance with D.N.J. LBR 9013-2(a)(2), objections, if any, must be filed with the Clerk of the United States Bankruptcy Court, 402 East State Street, Trenton, New Jersey 08608, and served upon Genova Burns, LLC, Attn: Donald W. Clarke, Esq., 110 Allen Road, Ste. 304, Basking Ridge, New Jersey so they are received in accordance with the Court’s order entered with respect to the Scheduling Application or, if the Scheduling Application is denied, in accordance with the Local Rules of the Bankruptcy Court.

**PLEASE TAKE FURTHER NOTICE** that in the absence of any objections, the relief requested hereunder may be granted without further notice.

Dated: June 5, 2023

**GENOVA BURNS LLC**

By: /s/ Daniel M. Stolz

Daniel M. Stolz, Esq.

Donald W. Clarke, Esq.

Gregory S. Kinoian, Esq.

110 Allen Rd., Suite 304

Basking Ridge, NJ 07920

Tel: (973) 467-2700

Fax: (973) 467-8126

Email: [DStolz@genovaburns.com](mailto:DStolz@genovaburns.com)

[DClarke@genovaburns.com](mailto:DClarke@genovaburns.com)

[GKinoian@genovaburns.com](mailto:GKinoian@genovaburns.com)

*Proposed Local Counsel for the Official  
Committee of Talc Claimants*